

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: )  
Andre Bisasor ) Chapter 13  
Debtor, ) Case No.: 15-13369

**EMERGENCY MOTION TO EXTEND THE TIME FOR RESPONDING TO MOTION  
FOR RELIEF FROM STAY AND TO CONTINUE THE HEARING ON THE MOTION  
FOR RELIEF FROM STAY**

I, Andre Bisasor, the debtor hereby requests this Honorable Court to extend the deadline for Responding to the Motion for Relief from Stay for 10 days up to and including Friday September 25, 2015 and therefore to also continue the hearing on the Motion for Relief from Stay until the following business day thereafter on Monday September 28, 2015 (or to date/time that works for the court's calendar). Grounds for this request is as follows:

1. On Thursday, August 27, 2015, I filed the chapter 13 case. I did not receive the order to update at that time.
2. On Friday, August 28, 2015, the court placed the order to update in the mail and sent it to my address.
3. On Tuesday, September 1, 2015, I received the order to update that was mailed to me from the court. It stated that the creditor matrix was due on September 2, 2015 and the remaining documents were due on September 11, 2015.
4. On September 1, 2015, I filed a Motion to Extend Time to File Documents asking for 30 days extension (or a date/time the court deemed proper) including an indication that I needed time to secure counsel given the complexity of a chapter 13 case as was advised by a deputy clerk of the bankruptcy court.